

Exhibit F

From: Hollabaugh, Lela <lhollabaugh@babco.com>
Sent: Sunday, November 24, 2013 9:14 PM
To: Greer, Marcy
Subject: Fwd: Depositions in meningitis cases

Sent from my iPhone

Begin forwarded message:

>
> -----Original Message-----
> From: Chalos, Mark P. [mailto:mchalos@lchb.com]
> Sent: Friday, November 22, 2013 3:40 PM
> To: 'Michael Geracioti'; Brian Cummings
> Cc: chris@gideoncooper.com; Hollabaugh, Lela
> Subject: RE: Depositions in meningitis cases
>
> Thanks, Michael.
>
> I will attempt to answer your questions, but none the questions or answers should impact your clients' ability to give us proposed dates for their depositions that were subpoenaed several weeks ago.
>
> Discovery is open in the MDL. The MDL judge has encouraged the parties to move forward with discovery. The deposition has been subpoenaed in the Wray case. We anticipate that the deposition will be cross-noticed in the MDL. There will likely be one questioner per party. If it is cross-noticed in the MDL, as expected, we will endeavor to have one lawyer question on behalf of both the Wrays and the MDL. Lawyers for other patients of Dr. Dickerson and Dr. Rome might also cross-notice the deposition, but we have no control over that. The scope of the deposition and time limit will be in accordance with the federal rules of civil procedure. We do not intend to inquire into private patient information of patients other than those represented at the deposition pursuant to notice.
>
> I am available to discuss further if you would like. In the meantime, please let us know which dates are convenient for your clients. I have also asked counsel for the St. Thomas entities and Howell Allen for their available dates and I have not received any response. I find it is generally better to try to agree on a date than for one side to pick them unilaterally. But, as I expressed earlier, given the impending start to the legislative session, we intend to proceed with these depositions in 2013.
>
> Thank you.
>
> -Mark
>
>
> Mark P. Chalos
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> mchalos@lchb.com
>

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> -----Original Message-----

> From: Michael Geraciotti [mailto:MGeraciotti@levineorr.com]
> Sent: Friday, November 22, 2013 3:24 PM
> To: Chalos, Mark P.; Brian Cummings
> Cc: chris@gideoncooper.com; lhollabaugh@babco.com
> Subject: RE: Depositions in meningitis cases

>
> Mark: It is my understanding that there was some type of "meet and confer" conference today in the MDL or related litigation in order to arrive at a discovery plan (and rules). If true, what was the outcome re deposition scheduling? Shouldn't the scheduling of the depositions follow some logical order (e.g. parties before peripheral medical provider witnesses)? Also, re the depositions of Drs. Dickerson and Rome, who will participate? Who will be able to ask questions? Who is bound by the testimony - all Ps or just the Wrays? Can the questions go beyond just the treatment of Wray to their treatment of other patients? Is there a time limit on the deposition?

>
> We believe (Brian and I) that these questions need to be addressed prior to the depositions of Drs. Dickerson and Rome. We certainly don't want them to be deposed more than once or, for that matter, for more than a specified time.

>
> Let us know your thoughts. I've copied Chris Tardio and Lela Hollabaugh, as I understand they are counsel of record in the Wray matter.

>
>
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> _____
> From: Chalos, Mark P. [mchalos@lchb.com]
> Sent: Thursday, November 21, 2013 1:25 PM
> To: Michael Geraciotti; Brian Cummings
> Subject: Depositions in meningitis cases

>
> Michael and Brian-

>
> Following up on our previous communications, can you guys please get us some proposed dates for the depositions of Dr. Dickerson and Dr. Rome? There is some particular urgency with respect to Dr. Dickerson, given the impending start of the legislative session.

>
> Thank you.

>
> -Mark Chalos

>

> Sent from my iPad

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